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June 27, 2005

BY ECF

Hon. Nina Gershon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11217

FILED
IN CLERK'S OFFICE
U. S. DISTRICT COURT E.D. N.Y.
★ JUL 6 2005 ★
TIME A.M. _____
P.M. _____

Re: Tamara Edwards v. Great Northern Insurance Company
03 Civ. 2947(NG)(RML)

Dear Judge Gershon:

I represent the Plaintiff Tamara Edwards in the above referenced case. I write to request that Plaintiff's time to respond to Defendant's Motion for Summary Judgment be extended to, and including July 15, 2005. Plaintiff's Response is currently due today, June 27, 2005. This is Plaintiff's first request for extension of time to respond to defendant's motion for summary judgment.

I called the defense Counsel on Friday, June 24, 2007 and left a message but I did not hear from him. I called and spoke to him today and he advised me that his firm had changed its phone system on Friday and that accounted for his not getting the message. He further advised me that the defendant will not consent to my request for an extension of time.

This request for extension of time is necessitated by several factors. In addition to several smaller briefs/responses, I have had to respond to defendant's motion for summary judgment in the matter of Khan v. HIP Centralized Laboratory Services, 03 Civ. 2411 (DGT) which was submitted on June 10, 2005 and file a Respondents' brief on June 17, 2005 in the matter of Mooney et al v. Covenant House et al, Docket No. 2004-08785, responding to two separate appellants' appeal in the Appellate Division, Second Department. Furthermore, this present motion is very involved and requires a lot of work both in legal research and going true the voluminous records produced during discovery in order to properly respond to defendant's motion for summary judgment.

Respectfully Submitted By: /s/ Anthony C. Ofodile
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6-29-05